

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.,	Case No. 08-13555 (SCC)
Debtors.	Jointly Administered

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**DECLARATION OF MADLYN GLEICH PRIMOFF IN SUPPORT OF SPANISH
BROADCASTING SYSTEM, INC.'S OPPOSITION TO MOTION BY LEHMAN
BROTHERS HOLDINGS INC. FOR SUMMARY JUDGMENT PURSUANT TO RULE
7056 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE REGARDING
CLAIM 67707 FILED BY SPANISH BROADCASTING SYSTEM, INC.**

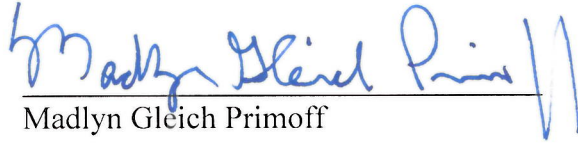
I, Madlyn Gleich Primoff, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

1. I am a member of the firm of Kaye Scholer LLP, counsel for Spanish Broadcasting System, Inc. ("Spanish Broadcasting") in this contested matter.
2. I submit this declaration in support of Spanish Broadcasting's opposition to the summary judgment motion [Dkt No. 50033], dated June 18, 2015, filed by Lehman Brothers Holdings Inc. with respect to Spanish Broadcasting's proof of claim number 67707.
3. Attached as Exhibit 1 is a true and correct copy of the Expert Report of James Trautman of Bortz Media & Sports Group, Inc., dated July 23, 2015.
4. Attached as Exhibit 2 is a true and correct copy of the Expert Report of Christopher J. Kearns of Berkeley Research Group, LLC¹ dated July 23, 2015.

¹ The former members and senior professionals at Capstone Advisory Group, LLC joined Berkeley Research Group, LLC on June 1, 2015.

5. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 23, 2015



Madlyn Gleich Primoff